

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtor.

Chapter 11

Case No. 22-11068 (JTD)

Jointly Administered

NOTICE

Fire Bouvardia, L.L.C. (“FB”) hereby states, based on knowledge and/or information and belief, the following:

1. FB entered a binding agreement (the “Agreement”) with Block Theory Capital PTE. Ltd. (the “Creditor”), pursuant to which Creditor agreed to sell its claims against FTX Trading Ltd. (the “Claims”) to FB.

2. FB understands that, notwithstanding the terms of the Agreement, the Creditor may propose to file a claim transfer form (a “Claim Transfer”) purporting to transfer the Claims to a third-party purchaser. FB files this notice to advise all potential purchasers of the Claims that it intends to object to and dispute any such Claim Transfer relating to the Claims. Any such purported transfer will interfere with the economic interest of FB.

¹ The last four digits of FTX Trading Ltd.’s tax identification number is 3288. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>

3. FB (a) preserves all of its rights and remedies against the Creditor, any third-party purchaser of the Claims, and all other parties against whom FB may have claims and (b) intends to exercise such rights and remedies in all appropriate forums.

Dated: April 30, 2024
Wilmington, Delaware

Respectfully submitted,

BIELLI & KLAUDER, LLC

By: /s/ David M. Klauder
David M. Klauder, Esq. (No. 5769)
1204 N. King Street
Wilmington, Delaware 19801
Telephone: (302) 803-4600
Email: dklauder@bk-legal.com

and

CROWELL & MORING LLP

Jennifer K. Grady, Esq.
Two Manhattan West, 375 9th Ave.
New York, New York 10001
Telephone: (212) 530-1893
Email: jgrady@crowell.com

Counsel to Fire Bouvardia, L.L.C.